

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Service Rules for the 746-764 and 776-794)	
MHz Bands, and Revisions to Part 27 of the)	WT Docket No. 99-168
Commission's Rules)	
)	
Carriage of Transmissions of Digital)	CS Docket No. 98-120
Television Broadcast Stations)	
)	
Review of the Commission's Rules and)	
Policies Affecting the Conversion to)	MM Docket No. 00-39
Digital Television)	
)	

To: The Commission

REPLY COMMENTS OF THE SPECTRUM CLEARING ALLIANCE

Paxson Communications Corporation ("Paxson"), together with other television station owners forming an alliance (hereinafter collectively the "Spectrum Clearing Alliance"), and pursuant to the Commission's *Public Notice*,¹ submits herewith its reply comments to Oppositions to Petitions for Reconsideration of the Commission's *Third R&O*² in the above-captioned proceeding regarding mechanisms to clear broadcasters from Channels 59-69 (the "700 MHz" band).

¹ "Pleading Cycle Established for Responses for Reconsideration of the Third Report and Order in WT Docket No. 99-168, CS Docket No. 98-120, and MM Docket No. 00-39," *Public Notice*, DA 01-788 (rel. Mar. 29, 2001) ("*Public Notice*").

² Service Rules for the 746-764 and 776-794 MHz Bands, and Revisions to Part 27 of the Commission's Rules, WT Docket No. 99-168, CS Docket No. 98-120, MM Docket No. 00-39, *Third Report and Order*, FCC 01-25 (rel. Jan. 23, 2001) ("*Third R&O*").

In light of the fact that no party appears to have filed an opposition other than the Spectrum Clearing Alliance, Paxson submits herewith:

- Time is critical and we again urge the Commission to act by the May 16, 2001 deadline that the Spectrum Clearing Alliance set forth in its Petition for Reconsideration to provide sufficient lead time for the band clearing efforts to be successful; and
- The Spectrum Clearing Alliance has a growing list of supporters who represent a significant majority of the analog incumbents in the 700 MHz band, thereby demonstrating that band clearing through voluntary agreements not only is possible but will occur if allowed to proceed and will directly impact both the DTV transition and the advent of 3G services in this country.

Respectfully submitted,

PAXSON COMMUNICATIONS
CORPORATION

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